

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MALINDA S. SMIDGA, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SPIRIT AIRLINES, INC.,

Defendant.

NO.: 2:22-cv-01578-MJH

FRANCES CURD, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SPIRIT AIRLINES, INC.,

Defendant.

NO.: 2:23-cv-00895-MJH

KAYLA MANDENG, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SPIRIT AIRLINES, INC.,

Defendant.

NO.: 2:23-cv-00784-MJH

JOINT MOTION TO CONSOLIDATE CASES

Pursuant to Fed. R. Civ. P. 42(a), Plaintiffs Malinda S. Smidga, Frances Curd, and Kayla Mandeng (“Plaintiffs”) and Defendant Spirit Airlines, Inc. (“Defendant”) (together, the “Parties”) hereby respectfully move this Court to consolidate the following cases (the “Actions”) for all purposes, excluding trial:

- (1) *Smidga v. Spirit Airlines, Inc.*, 2:22-cv-01578-MJH;
- (2) *Curd v. Spirit Airlines, Inc.*, 2:23-cv-00895-MJH; and
- (3) *Mandeng v. Spirit Airlines, Inc.*, 2:23-cv-00784-MJH.

As explained in the attached Memorandum of Law, which is incorporated by reference herein, consolidation is warranted because the Actions present common issues of law and fact, and consolidation will promote judicial economy and convenience.

Respectfully submitted:

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Dated: June 30, 2023

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CERTIFICATE OF SERVICE

I, Brian T. Feeney, hereby certify that on this 30th day of June, 2023, I caused a true and correct copy of the foregoing Joint Motion for Consolidation to be served via this Court's electronic filing service on all counsel of record.

/s/ Brian T. Feeney
Brian T. Feeney, Esq.